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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DEREK MYERS,

Plaintiff,

vs.

TRANS UNION, LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; WELLS FARGO BANK, N.A.; FIRST
SERVICE CREDIT UNION; CITIBANK,
N.A. DBA CITICARDS, CBNA; and SILVER
STATE SCHOOLS CREDIT UNION,

Defendants.

Case No. 2:22-cv-02026-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND DEFENDANT WELLS
FARGO BANK, N.A.'S TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

It is hereby stipulated by and between Plaintiff Derek Myers ("Plaintiff"), through his attorneys, George Haines and Gerardo Avalos, and Defendant Wells Fargo Bank, N.A. ("Wells Fargo"), through its attorneys, the law firm of Snell & Wilmer L.L.P., as follows:

Wells Fargo's current deadline to respond to the Complaint is December 29, 2022¹. In the interest of conserving client and judicial resources, Plaintiff and Wells Fargo stipulate and agree that Wells Fargo shall have an extension until **January 20, 2023**, in which to file its responsive pleading.

¹ This is based on the service date of December 8, 2022.

1 This is the parties' first request for an extension of time to respond to the Complaint, and is
2 not intended to cause any delay or prejudice to any party, but is requested for good cause and so
3 that Wells Fargo can have adequate time to prepare its response.

4 Dated: December 14, 2022

SNELL & WILMER L.L.P.

6 By: /s/ Tanya N. Lewis

7 Kelly H. Dove
8 Tanya N. Lewis
9 3883 Howard Hughes Parkway
10 Suite 1100
11 Las Vegas, Nevada 89169

*Attorneys for Defendant Wells Fargo
Bank, N.A.*

12 Dated: December 14, 2022

FREEDOM LAW FIRM

14 By: /s/ Gerardo Avalos

15 George Haines Esq.
16 Gerardo Avalos Esq.
17 8985 S. Eastern Ave., Suite 350
18 Las Vegas, Nevada 89123

Attorney for Plaintiff

**e-signed with permission via email*

ORDER

20 **IT IS HEREBY ORDERED THAT Wells Fargo's time to respond to Plaintiff's**
21 **Complaint is extended to January 20, 2023.**

22 **IT IS SO ORDERED.**

23 

24 UNITED STATES DISTRICT JUDGE

25 DATED December 15, 2022.

Snell & Wilmer
L.L.P.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

1 Respectfully submitted by:

2 SNELL & WILMER L.L.P.

3 /s/ Tanya N. Lewis

Kelly H. Dove, Esq.

4 Tanya N. Lewis, Esq.

3883 Howard Hughes Parkway, Suite 1100

5 Las Vegas, NV 89169

6 *Attorneys for Defendant Wells Fargo Bank, N.A.*

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically transmitted the foregoing **STIPULATION AND ORDER TO EXTEND DEFENDANT WELLS FARGO BANK, N.A.'s TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** with the Clerk of Court for the U.S. District Court, District of Nevada by using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

George Haines, Esq.
Gerardo Avalos, Esq.
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 350
Las Vegas, NV 89123
info@freedomlegalteam.com

Attorneys for Plaintiff Derek Myers

DATED: December 14, 2022

/s/ Susan Ballif
An employee of SNELL & WILMER L.L.P.